




April 4, 2006

TO: Mr. Russell Hart, RPM
United States Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

FROM: Mr. David Curnock, PM, SECOR International Incorporated 

RE: **MONTHLY PROGRESS REPORT/MEMORANDUM**
Area 9/10 Remedial Design
Southeast Rockford Groundwater Contamination Superfund Site
Rockford, Illinois

Copies: Mr. Thomas Turner, Regional Counsel, USEPA Region V
Mr. Scott Moyer, Hamilton Sundstrand/United Technologies Corporation
Ms. Kathleen McFadden, United Technologies Corporation
Mr. Thomas Williams, PM, IEPA
Mr. Terry Ayers, IEPA

CURRENT MONTH PROJECT ISSUES/STATUS: *(activities, meetings, deliverables, etc.)*

Activities conducted in March 2006 consisted of the completion of the internal draft of Pre-Design Investigation Summary (PDI) report, conceptual design of a phased remedial design, and jet fuel recovery system operations in South Alley.

An internal draft of the PDI report has been completed and is under review. This report incorporates the results of the implementation of the processes outlined in the Remedial Design Work Plan. The PDI report provides information from pre-mobilization activities, such as an electro-magnetic (EM) and ground penetrating radar (GPR) survey of the Rockford Products parking lot located south of the Hamilton Sundstrand (HS) Plant #1, along with other historical information gathering efforts (historic maps and drawings). The PDI report also provides the results of soil sampling and groundwater sampling/monitoring activities performed. The PDI is an integral portion of the Remedial Design in that the data developed during this process was, and has, provided the direction for design development.

The area of focus at this time with respect to the overall Remedial Design, based on down-gradient groundwater monitoring results, is a portion of the area beneath the HS Plant #1. The most likely location of the potential source material is associated with the former area of underground storage tanks (USTs) which were in the central portion of the plant south of the loading dock area. Active free product recovery is also continuing in the South Alley area of the site.

As communicated at the beginning of 2006, HS announced a business decision to realign future operations at the Plant #1 facility. The major impact of this decision on the remedial design process is that a significant portion of the current building footprint (western portion)

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will become accessible. This represents an opportunity for access to potential source areas (former UST area) currently under the operating plant. The detailed plans and associated timelines for these facility changes are being developed by HS corporate personnel. As these plans develop, USEPA will be informed. Additional discussions between USEPA and HS will be proceeding regarding access (schedule) to the current manufacturing areas and design considerations based on this opportunity.

Based on the anticipated changes at the facility, HS along with USEPA have begun preliminary discussion and evaluation of a phased approach to the Remedial Design for Area 9/10. The phased approach will take into consideration the aspect of future access to some of the areas currently under HS Plant #1 while also allowing certain design elements to be undertaken before that future under plant access is realized. The initial phase would address (focus on) the western portion of the South Alley area and the outside storage container area (OSA).

The future access to the building area and the phased approach to design allows for the use of the more traditional "vertical" systems rather than horizontal systems previously identified as the mode of Record of Decision (ROD) technology deployment. That being the case, the Horizontal Groundwater Monitoring Well Installation and Testing Work Plan previously submitted will not be implemented.

Subsequent RD activities beyond the first phase would be predicated on additional data or information gathered as areas within the building footprint become available. HS and USEPA will keep an open dialogue regarding the performance and timing of the continued source identification and remedial design activities for Area 9/10.

The operation and monitoring of hydrocarbon recovery of LNAPL (JP-4) from the recovery systems in the south alley continues. March activities consisted of monitoring of the recovery system operation. The measured thickness of product in wells RW-1, RW-2 and RW-3R are 0.05 feet, 0.03 feet, and 0.03 feet, respectively as of March 23, 2006. Approximately 88 gallons of product were recovered during the first quarter of 2006 (January through March).

FUTURE PROJECT ISSUES/STATUS: *(activities, meetings, deliverables, etc.)*

Future project activities anticipated for April 2006 and beyond include:

- Continued discussion with USEPA regarding phased design efforts currently proposed. A meeting is being scheduled between HS, USEPA, IEPA and SECOR for early/mid April to further these discussions.
- Internal (HS) development of specific projects and timelines associated with the facility realignment and communication of these final plans with USEPA.
- Completion of internal review and preparation and submittal of the Pre-Design Investigation Data Summary Report to USEPA (et. al.). This report includes boring

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logs, figures, groundwater water level and flow information, and all laboratory analyses undertaken as part of the Pre-Design Investigation to date;

- Continue collection of water and product level data from the groundwater monitoring network on a periodic basis (next event scheduled for April) and
- Operation, maintenance, and monitoring of the South Alley recovery well system and evaluation of the LNAPL (JP-4) presence and recovery rates will continue.

SAMPLE/TEST DATA SUBMITTALS:

None. PDI report is intended to be provided to USEPA (et. al.) at the up-coming meeting scheduled for early/mid April.

RD SCHEDULE UPDATE: *(attach updated schedule as necessary)*

As the activities associated with the PDI portion of the RD are completed, the overall schedule will continue to be revised. The PDI will be submitted in April and additional discussions and a meeting regarding the phased design approach will be undertaken in April. With the many changes going on at the facility and the opportunity for substantial site constraints to be removed as part of the facility realignment process, it is desired that an open dialogue regarding the performance and timing of the continued source identification and remedial design activities for Area 9/10 be maintained at this time.

REALIZED/ANTICIPATED PROBLEM CONDITIONS:

None.

PERSONNEL CHANGES:

None.